Illinois Commerce Commission Pipeline Safety Field Trip Report

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513					
Exit Meeting Contact: N/A	Total Man Days: 1					
Pipeline Safety Representative(s): Kevin Hecker, Aaron McElravy						
Company Representative to Receive Report: Michael Fuller	Emailed Date:					
Company Representative's Email Address: mfuller2@ameren.com	10/01/2013					

Inspection Summary

Inspection Type	Location	ICC Analyst	Inspection Unit(s)	Man Day(s)	Inspection Date(s)	Contact(s)
Compliance Follow-Up		Kevin Hecker, Aaron McElravy	PAWNEE	1	8/26/2013 (Half)	N/A

Statement of Activities

On August 26, 2013, Aaron McElravy and Kevin Hecker attended a meeting at Ameren Illinois' facility in Pawnee, Illinois. Ameren was represented by Dallas Jett, Mike Fuller and Mike Maxheimer. The purpose of the meeting was to discuss the welding procedures observed during a tie-in of 2 newly-installed mains at Morgan Avenue and N. Atchison Street in Marion, Illinois on August 13, 2013. Work was performed by James Brust from K&S Construction, contracted by Ameren, Illinois. ICC Staff observing the work was Kevin Hecker, Matt Smith and Aaron McElravy.

The tie-in consisted of (2) 6.625" coated steel mains bored in at approximately 90 degree angle with one main approximately 18" above the other. Mr. Brust (welder) created a section consisting of a 90 degree elbow, a short section of pipe and a 45 degree elbow. The 90 elbow was held in place to the "top" main utilizing a line-up clamp. This section of pipe was also supported by a backhoe and strap to maintain stability/proper line-up. A 3-point fitting clamp was used to gain alignment where the 45 degree elbow was to be welded to the "bottom" main. After completing approximately 1/3 of the root pass on the "bottom" joint, the welder loosened the clamp and rotated it out of the way to gain better visibility to the underside of the pipe before continuing the root pass weld. Staff asked Dallas Jett why the clamp was loosened prior to 50% of the root pass being completed as it specifically states in the operator's procedure. Mr. Jett advised he would confer with Mr. Maxheimer. Mr. Jett came back to the work site with a GENERAL construction procedure that permits repositioning of the clamp as long as no "undue stress" is on the joint. Staff questioned this for two reasons: 1. it is difficult to say when a pipe is in "undue stress" and, 2. the specific welding procedure states that a line up clamp must not be moved until at least 50% of the root pass is completed. Staff requested additional information as to why there is ambiguity between the two welding procedures.

During the Pawnee meeting, it was explained by Mike Maxheimer that the SPECIFIC procedure is a "typo". In the paragraph of the welding procedure it states:

"Type of Line-Up Clamp and Removal: An external clamp or internal clamp as determined by company. External clamps shall remain in place upon completion of 50% of the root bead in increments equally spaced around the pipe. Internal clamps shall remain in place until a minimum of 90% of the root bead is completed."

Mr. Maxheimer stated that the welding procedure SHOULD say, "whether a clamp (either internal or external) is used may be determined by the company," and reminded Staff that API 1104 does NOT require the use of clamps at all. Mr. Maxheimer went on to state that he could just "remove line up clamps from the procedure then." (API 1104 doesn't state they are absolutely required.) Staff advised against this approach to our question, and reminded Mr. Maxhiemer that the purpose of the meeting was not to make the procedure LESS specific, but was to address the ambiguity between the 2 procedures. Upon reviewing the exact language of the current written welding procedure, Mr. Maxheimer conceded that the way the procedure is currently written which states "external clamps shall remain in place upon completion of 50% of the root bead in increments equally spaced around the pipe" leaves little room for interpretation. Mr. Maxheimer maintains that all the procedures are being evaluated and will likely be

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rewritten to include a statement that permits a welder to move the clamp if deemed necessary and in what situations the movement of a clamp would be permitted.

ISSUE(S) FOUND:

NO ISSUES FOUND.

ISSUE(S) CORRECTED:

NO ISSUES CORRECTED.

NOTICE OF AMENDMENT(S) FOUND:

NO NOAs FOUND.

NOA(S) CORRECTED:

NO NOAs CORRECTED.

NOTICE OF PROBABLE VIOLATION(S) FOUND:

NO NOPVs FOUND.

NOPV(S) CORRECTED:

NO NOPVs CORRECTED.